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January 25, 2018

**BY ECF**

Honorable Valerie E. Caproni  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 443  
New York, NY 10007

**Re: Steve Sands v. The Buffalo News, Inc., Civil No. 1:17-cv-4265 (VEC)**

Dear Judge Caproni:

Pursuant to Your Honor's Order dated January 11, 2018 [Dkt. 38], Defendant hereby submits a Declaration from Robert Clary of Secure Network Technologies, Inc., who conducted a forensic review of the emails and metadata provided by Mr. Liebowitz.

Respectfully submitted,

s/ Jeremy P. Occek

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